

Giesen, T

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re TREMONT SECURITIES LAW, STATE
LAW AND INSURANCE LITIGATION

Master Docket No. 08 Civ. 11117 (TPG)

This document relates to:
THE INSURANCE ACTION, 09 Civ. 557
(TPG), specifically to:

THE INTERNATIONAL DAD TRUST,

Plaintiff,

-against-

TREMONT OPPORTUNITY FUND III, L.P.,
et al.,

Defendants.

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DATE FILED: 2/3/12

11 Civ. 1687 (TPG)

**STIPULATION AND [PROPOSED] ORDER EXTENDING THE SCHEDULE
FOR BRIEFING OF DEFENDANTS' ANTICIPATED MOTIONS TO DISMISS**

WHEREAS, on August 19, 2011, this Court approved a partial settlement in *In re Tremont Securities Law, State Law and Insurance Litigation*, No. 08-Civ-11117 (TPG) (S.D.N.Y. 2009);

WHEREAS, on October 20, 2011, the Court held a status conference to determine how several cases that remain pending in the above-referenced litigation should proceed;

WHEREAS, on November 14, 2011, the Court entered an Order that, among other things, provided as follows: (i) Plaintiffs shall determine whether they wish to file amended or consolidated complaints in their respective actions, and if they elect to do so, their amended or consolidated complaints shall be filed by December 19, 2011; (ii) Defendants shall file motions to dismiss or answers to the complaints in each action by January 31, 2012; (iii) Plaintiffs shall

file opposition papers to the motions by February 29, 2012; and (iv) Defendants shall file replies by March 20, 2012;

WHEREAS, Plaintiff The International DAD Trust ("International DAD") filed its Amended Complaint on December 19, 2011;

WHEREAS, Defendants seek a two-week extension of the schedule for the briefing on Defendants' anticipated motion to dismiss;

WHEREAS, Plaintiff does not oppose Defendants' request; and

WHEREAS, Defendants have made no prior requests to extend the schedule for the briefing on Defendants' anticipated motion to dismiss;

IT IS HEREBY STIPULATED, by and between the undersigned counsel for the parties, without waiving any rights, defenses, or arguments they may assert, except as set forth below, and subject to the approval of the Court, as follows:

1. Defendants shall file their response to Plaintiff International DAD's Complaint by February 14, 2012;

2. Should Defendants, or any of them, move to dismiss the Amended Complaint, Plaintiff International DAD shall file its opposition to Defendants' motions to dismiss thirty (30) days after Defendants' motion to dismiss is filed; and

3. Defendants shall file any reply briefs twenty (20) days after the filing of Plaintiff International DAD's opposition.

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January , 2012

By:

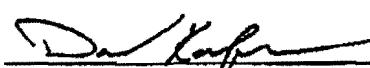
 
COOPER REED & McGRAW PC

James D. MacIntyre
Ralph C. Perry-Miller
1601 Elm St Ste 4600
Dallas, TX 75201
214.237.6348

Attorneys for The International DAD Trust

January 27, 2012

By:

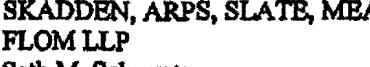

TANNENBAUM HELPERN SYRACUSE
& HIRSCHTRITT LLP

Jamie B.W. Stecher
Ralph A. Siciliano
David J. Kanfer
900 Third Avenue
New York, NY 10022
212.508.6700

*Attorneys for Tremont Opportunity Fund III,
L.P. and Tremont International Insurance
Fund LP*

January , 2012

By:


SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP
Seth M. Schwartz
Jason C. Vigna
Four Times Square
New York, NY 10036
212.735.3000

*Attorneys for Tremont Group Holdings, Inc.
and Tremont Partners, Inc.*

[954539-1]

January , 2012

By:

LOOPER REED & McGRAW PC
James D. MacIntyre
Ralph C. Perry-Miller
1601 Elm St Ste 4600
Dallas, TX 75201
214.237.6348

Attorneys for The International DAD Trust

January 27, 2012

By:

TANNENBAUM HELPERN SYRACUSE & HIRSCHTRITT LLP
Jamie B.W. Stecher
Ralph A. Siciliano
David J. Kanfer
900 Third Avenue
New York, NY 10022
212.508.6700

Attorneys for Tremont Opportunity Fund III, L.P. and Tremont International Insurance Fund LP

January 27, 2012

By:

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Seth M. Schwartz
Jason C. Vigna
Four Times Square
New York, NY 10036
212.735.3000

Attorneys for Tremont Group Holdings, Inc. and Tremont Partners, Inc.

[954539-1]

January 27, 2012

By: /s/ David A. Kotler
DECHERT LLP
William K. Dodds
David A. Kotler
1095 Avenue of the Americas
New York, NY 10036
212.698.3500

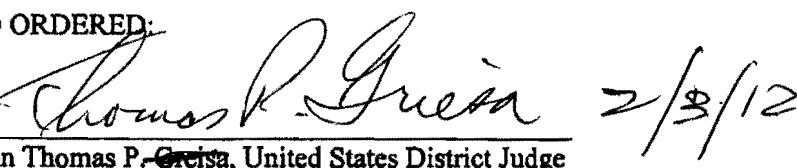
*Attorneys for Oppenheimer Acquisition
Corp.*

January 27, 2012

By: /s/ Carol E. Head
BINGHAM McCUTCHEN LLP
Carol Elisabeth Head
Joseph L. Kociubes
One Federal Street
Boston, MA 02110
617.951.8831

*Attorneys for Massachusetts Mutual Life
Insurance Company and MassMutual
Holding LLC*

SO ORDERED:


Hon Thomas P. Griesa, United States District Judge